

# **APPENDIX A**

**APPENDIX A:** Selected<sup>1</sup> Quotations from Dr. Shamos' Invalidity Report that cite to admitted trial exhibits and support his opinion that certain asserted claims are obvious in view of the combination of J-CON and the Dworkin patent.

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
<b>'683 Patent</b>		
<b>3. An electronic sourcing system comprising:</b>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>"The J-CON Manual describes an electronic-sourcing system, the J-CON ("Jobber- Connection") system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called "Jobbers" in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the '172 Patent Reexamination at 22)." L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S95 at p. 23):</b></p> <p>"J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: 'PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.'</p> <p>Purchasing items is disclosed [sic], e.g., at L0123459 et seq. ('Start the Sale'). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z95 at p. 23):</b></p> <p>"Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: 'An automated system assists a user in locating and purchasing goods or services sold by a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, specifications and/or availability.' Abstract." (DX-244)</p>

<sup>1</sup> In the interest of brevity, Lawson has not exhaustively included every citation in support of these arguments that Dr. Shamos made to an admitted exhibit in his expert report, but rather has included representative citations to admitted exhibits.

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>L0123964 et seq. (Inventory Information).” (DX-96).</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R95 at p. 23):</b></p> <p>“J-CON is an electronic sourcing system. (L0123423).” (DX-96).</p>	
<p><b>at least two product catalogs containing data relating to items associated with the respective sources;</b></p>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z97 at p. 24):</b></p> <p>“Dworkin discloses this element, as shown in Fig. 1:</p> <p>In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers. 3:66-68. See also ‘172 claim 1c.” (DX-244)</p>
<p><b>means for selecting the product catalogs to search;</b></p>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the ‘683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the ‘172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S99 at p. 25):</b></p> <p>“You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.” L0123624.</p> <p>The purpose of InterChange was to allow selection from among competitive items from multiple sources.” L0123624 (DX-</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z99 at p. 25):</b></p> <p>“Dworkin discloses a means for searching for search results that match the entered product information in the selected portions of the database: ‘The system accepts a selection from the user, in block 31. The selection can be made by transmitting the number associated with the desired item.’ 5:35-37. See also 5:55-62.</p> <p>“Thus, if the user indicates that the printer must have a letter-quality speed of 40 cps, the system will search for printers which have a letter-quality speed of 40 cps or faster.’ 6:7-10. Searching cannot be performed unless the criteria are communicated to the search engine.</p> <p>‘When the user has entered these specifications, the system searches its database, in block 39, for products fulfilling the indicated criteria.’ 6:12-14.</p> <p>“Then, in block 40, the system displays the results.” 6:14-15.” (DX-244)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	96).	
<b>means for searching for matching items among the selected product catalogs;</b>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123601, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R102 at p. 26):</b></p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96).</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z102 at p. 26):</b></p> <p>“Dworkin discloses a means for searching for search results that match the entered product information in the selected portions of the database: ‘The system accepts a selection from the user, in block 31. The selection can be made by transmitting the number associated with the desired item.’ 5:35-37. See also 5:55-62.</p> <p>‘Thus, if the user indicates that the printer must have a letter-quality speed of 40 cps, the system will search for printers which have a letter-quality speed of 40 cps or faster.’ 6:7-10. Searching cannot be performed unless the criteria are communicated to the search engine.</p> <p>‘When the user has entered these specifications, the system searches its database, in block 39, for products fulfilling the indicated criteria.’ 6:12-14.</p> <p>‘Then, in block 40, the system displays the results.’ 6:14-15.” (DX-244)</p>
<b>means for building a requisition using data relating to selected matching items and their associated source(s);</b>	<p><b>From Shamos Report (Ex. F) at ¶197:</b></p> <p>“Upon selection of desired parts from database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON Manual at Ch. 3, Sec. 2, Pages 1, 4 &amp; 8-9; Final Rejection in the ’683 Patent Reexamination at 11-12 &amp; 34; Non-Final rejection in the ’172 Patent Reexamination at 23).” L0123603, L0123607, L0123611-12 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R105 at p. 26):</b></p> <p>“J-CON enabled a user to select items to</p>	

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	add to a requisition (ticket). (L0123606).” (DX-96).	
<p><b>means for processing the requisition to generate one or more purchase orders for the selected matching items; and</b></p>	<p><b>From Shamos Report (Ex. F) at ¶200:</b></p> <p>“Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 &amp; Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the ’683 Patent Reexamination at 12; Non-Final rejection in the ’172 Patent Reexamination at 23-24).” L0123691; L0123693-699 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S107 at p. 27):</b></p> <p>“The reference discloses a means for processing a requisition to generate purchase orders for requisition items.</p> <p>‘You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS.’ L0123693</p> <p>The module has access to the requisition (ticket): ‘When you compute PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.’ L0123695” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R107 at p. 27):</b></p> <p>“J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).” (DX-96).</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z107 at p. 27):</b></p> <p>“The order module of Dworkin generates purchase orders. A ‘predetermined rule,’ e.g. is that a user can set up the system so he need not enter a name and address each time a product is ordered. 8:20-24.” (DX-244)</p>
<p><b>means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.</b></p>	<p><b>From Shamos Report (Ex. F) at ¶199:</b></p> <p>“The J-CON system could perform a cross-referencing or converting of data relating to an item on the requisition to determine an alternative source for the same item and/or an acceptable substitute for the item initially selected. (The J-CON Manual at Ch. 3, Sec. 2, Pages 6 &amp; 11 &amp; Ch. 3, Sec. 4, Pages 1-5; Final</p>	

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	<p>Rejection in the '683 Patent Reexamination at 13-14 &amp; 35-36; Non-Final rejection in the '172 Patent Reexamination at 25-26)." L0123608, L0123611, L0123621-625 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S109 at p. 28):</b></p> <p>"The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.</p> <p>To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate 'generally equivalent' items, this limitation is also disclosed in J-CON and in Lawson's prior art system.</p> <p>The reference discloses maintaining a cross-reference table (non-catalog database) or file identifying cross-referenced items: 'InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder.' L0123621." (DX-96).</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S110 at p. 28):</b></p> <p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts).' L0123601.</p> <p>'[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.' L013628." (DX-96).</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R109 at p. 28):</b></p>	

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	<p>“The J-CON system located interchangeable part from different catalogs are associated with a ‘competitive part number’ in the cross-referencing module InterChange. (L0123625).” (DX-96).</p>	
<p><b>26. A method comprising the steps of:</b></p>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z132 at p. 32):</b></p> <p>“The reference discloses a method.</p> <p>Claim 26 is obvious in light of Dworkin.” (DX-244)</p>
<p><b>maintaining at least two product catalogs on a database containing data relating to items associated with the respective sources;</b></p>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z133 at p. 33):</b></p> <p>“Dworkin discloses this element, as shown in Fig. 1:</p> <p>In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers. 3:66-68. See also ‘172 claim 1c.” (DX-244)</p>
<p><b>selecting the product catalogs to search;</b></p>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the ‘683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the ‘172 Patent Reexamination at 22).” L123601, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S135 at p. 33):</b></p> <p>“Searches may be limited to a particular manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z135 at p. 33):</b></p> <p>“The user's catalog selection was described above in connection with ‘516 claim 1, particularly 1d.” (DX-244)</p>

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	manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.' L0123624." (DX-96)	
searching for matching items among the selected product catalogs;	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>"The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the '172 Patent Reexamination at 22)." L123601, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S137 at p. 34):</b></p> <p>"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name.' L0123609." (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R137 at p. 34):</b></p> <p>"J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472)." (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z137 at p. 34):</b></p> <p>"When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.' 2:25-29.</p> <p>See also '172 1c." (DX-244)</p>
building a requisition using data relating to selected matching items	<p><b>From Shamos Report (Ex. F) at ¶197:</b></p> <p>"Upon selection of desired parts from</p>	



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<p><b>and their associated sources;</b></p>	<p>database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON Manual at Ch. 3, Sec. 2, Pages 1, 4 &amp; 8-9; Final Rejection in the ’683 Patent Reexamination at 11-12 &amp; 34; Non-Final rejection in the ’172 Patent Reexamination at 23).” L0123603, L0123607, L0123611-12 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R140 at p. 34):</b></p> <p>“J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).” (DX-96)</p>	
<p><b>processing the requisition to generate one or more purchase orders for the selected matching items; and</b></p>	<p><b>From Shamos Report (Ex. F) at ¶200:</b></p> <p>“Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 &amp; Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the ’683 Patent Reexamination at 12; Non-Final rejection in the ’172 Patent Reexamination at 23-24).” L0123691; L0123693-699 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S142 at p. 35):</b></p> <p>“J-CON generated multiple purchase orders from a single requisition . ‘The purchasing programs enable you to quickly create purchase orders based on your real needs.’ L0123423.” (DX-96)</p> <p>“‘You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7.’ L0123693.” (DX-96)</p> <p>“Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: ‘When you compute a PO for primary or</p>	

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	<p>alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R142 at p. 35):</b></p> <p>“J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).” (DX-96)</p>	
<p><b>determining whether a selected matching item is available in inventory.</b></p>	<p><b>From Shamos Report (Ex. F) at ¶197:</b></p> <p>“For a selected item on the requisition, the J-CON system could electronically determine the current availability in the inventory of the automotive parts store, any sister stores associated with the automotive parts store, and/or independent distributors to the automotive parts store. (The J-CON Manual at Ch. 2, Sec. 10, Page 15 &amp; Ch. 3, Sec. 2, Pages 6 &amp; 10; Final Rejection in the ’683 Patent Reexamination at 13 &amp; 34; Non-Final rejection in the ’172 Patent Reexamination at 25-26).” L0123555, L0123609, L0123613 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S144 at p. 35):</b></p> <p>““JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT.’ L0123450.” (DX-96)</p> <p>““Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing &lt;Whse Inquiry&gt; from any field on the POS screen except WRKSTAT.’ L0123451. Inventory inquiry is described in detail starting at L0123541.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R144 at p. 35):</b></p> <p>“The J-CON system enabled a user to</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z144 at p. 35):</b></p> <p>“The supplier information screen (FIG. 7) could also include information on the availability of the product. Such information (not shown in FIG. 7) could include 1) the time required for the product to be shipped ... 7:54-57” (DX-244)</p>

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	determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).” (DX-96)	
<b>28. A method comprising the steps of:</b>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z146 at p. 36):</b></p> <p>“The reference discloses a method.” (DX-244)</p>
<p><b>maintaining at least two product catalogs on a database containing data relating to items associated with the respective sources;</b></p>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z147 at p. 36):</b></p> <p>“Dworkin discloses this element, as shown in Fig. 1:</p> <p>In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers. 3:66-68. See also '172 claim 1c.” (DX-244)</p>
<p><b>selecting the product catalogs to search;</b></p>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the '172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S149 at p. 37):</b></p> <p>“Searches may be limited to a particular manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z149 at p. 37):</b></p> <p>“The user's catalog selection was described above in connection with '516 claim 1, particularly 1d.” (DX-244)</p>

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<p><b>searching for matching items among the selected product catalogs;</b></p>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the '172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S151 at p. 37):</b></p> <p>““The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name.’ L0123609.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R151 at p. 37):</b></p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z151 at p. 37):</b></p> <p>““When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.’ 2:25-29.</p> <p>See also '172 1c.” (DX-244)</p>
<p><b>building a requisition using data relating to selected matching items and their associated source(s);</b></p>	<p><b>From Shamos Report (Ex. F) at ¶197:</b></p> <p>“Upon selection of desired parts from database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON</p>	

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	<p>Manual at Ch. 3, Sec. 2, Pages 1, 4 &amp; 8-9; Final Rejection in the '683 Patent Reexamination at 11-12 &amp; 34; Non-Final rejection in the '172 Patent Reexamination at 23)." L0123603, L0123607, L0123611-12 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R154 at p. 38):</b></p> <p>"J-CON enabled a user to select items to add to a requisition (ticket). (L0123606)." (DX-96)</p>	
<p><b>processing the requisition to generate one or more purchase orders for the selected matching items; and</b></p>	<p><b>From Shamos Report (Ex. F) at ¶200:</b></p> <p>"Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 &amp; Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the '683 Patent Reexamination at 12; Non-Final rejection in the '172 Patent Reexamination at 23-24)." L0123691; L0123693-699 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S156 at p. 38):</b></p> <p>"J-CON generated multiple purchase orders from a single requisition. 'The purchasing programs enable you to quickly create purchase orders based on your real needs.' L0123423." (DX-96)</p> <p>"'You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up P0 control files in Function 7.7.' L0123693." (DX-96)</p> <p>"Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: 'When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to</p>	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>be ordered.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R156 at p. 38):</b></p> <p>“J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).” (DX-96)</p>	
<p><b>converting data relating to a selected matching item and an associated source to data relating to an item and a different source.</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S159 at p. 39):</b></p> <p>“J-CON had a sophisticated system for keeping track of equivalent items, dividing them into ‘Replaced Parts,’ ‘Substitute Parts,’ and ‘Can-Use Parts.’ L0123551. Furthermore, ‘Alternate Parts’ and ‘Primary and Alternate Manufacturers’ are disclosed at L0123613.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R158 at p. 39):</b></p> <p>“The J-CON system located interchangeable part from different catalogs are associated with a ‘competitive part number’ in the cross-referencing module InterChange. (L0123625).” (DX-96)</p>	
<p><b>29. The method of claim 28 further comprising the step of determining whether a selected matching item is available in inventory.</b></p>	<p><b>From Shamos Report (Ex. F) at ¶197:</b></p> <p>“For a selected item on the requisition, the J-CON system could electronically determine the current availability in the inventory of the automotive parts store, any sister stores associated with the automotive parts store, and/or independent distributors to the automotive parts store. (The J-CON Manual at Ch. 2, Sec. 10, Page 15 &amp; Ch. 3, Sec. 2, Pages 6 &amp; 10; Final Rejection in the ’683 Patent Reexamination at 13 &amp; 34; Non-Final rejection in the ’172 Patent Reexamination at 25-26).” L0123555, L0123609, L0123613 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S165 at p. 39):</b></p> <p>“‘JIF Inquiry gives you inventory</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z165 at p. 39):</b></p> <p>“Claim 28 is not anticipated by the reference, but the step of claim 29 is identical to that of step 26f, which is disclosed in the reference.” (DX-244)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT.’ L0123450.” (DX-96)</p> <p>““Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing &lt;Whse Inquiry&gt; from any field on the POS screen except WRKSTAT.’ L0123451. Inventory inquiry is described in detail starting at L0123541.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R165 at p. 39):</b></p> <p>“The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 &amp; L0123612).” (DX-96)</p>	
<b>‘516 Patent</b>		
<b>1. An electronic sourcing system comprising:</b>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON Manual describes an electronic-sourcing system, the J-CON (“Jobber- Connection”) system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the ‘683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the ‘172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S34 at p. 6):</b></p> <p>“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z34 at p. 6):</b></p> <p>“Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: ‘An automated system assists a user in locating and purchasing goods or services sold by a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, specifications and/or availability.’ Abstract.” (DX-244)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>(Retail) Locating items is disclosed, e.g., at L012360: 'PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.'" (DX-96)</p> <p>"Purchasing items is disclosed [sic], e.g., at L0123459 et seq. ('Start the Sale'). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information)." (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R34 at p. 6):</b></p> <p>"J-CON is an electronic sourcing system. (L0123423)." (DX-96)</p>	
<p><b>a collection of catalogs of items stored in an electronic format;</b></p>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z37 at p. 7):</b></p> <p>"Dworkin discloses this element, as shown in Fig. 1:</p> <p>In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers. 3:66-68. See also '172 claim 1c.'" (DX-244)</p>
<p><b>a first set of predetermined criteria associated with said collection of catalogs;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S39 at p. 8):</b></p> <p>"If 'first set of pre-determined criteria' means restriction to specific catalogs, then searches may be limited by manufacturer. 'You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.' L0123624.'" (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z39 at p. 8):</b></p> <p>"If 'first set of pre-determined criteria' means restriction to specific catalogs, then the pre-determined criterion is the general type of product or service to be located, as shown in Fig. 3.'" (DX-244)</p>
<p><b>a second set of predetermined criteria</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S41 at p. 8):</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z41 at p. 8):</b></p>



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<p><b>associated with items from each of said catalogs;</b></p>	<p>“If ‘second set of pre-determined criteria’ means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. ‘The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be.’ L0123609.” (DX-96)</p> <p>“J-CON also provided for wildcard searching: ‘When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices.’ L0123473.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R41 at p. 8):</b></p> <p>“J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).” (DX-96)</p>	<p>“If ‘second set of pre-determined criteria’ means restriction to items, then items may be searched by selecting product subcategories as shown in Fig. 4.” (DX-244)</p>
<p><b>a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S42 at p. 9):</b></p> <p>“‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z42 at p. 9):</b></p> <p>“To the extent ePlus contends that Lawson's accused system meets this limitation, it is also met by Dworkin and Lawson's prior art system.</p> <p>‘It is another object to provide a system which replaces a plurality of catalogs, and which greatly reduces the time required in shopping for products or services. It is another object to provide a system and method as described above, wherein a user can easily shop for equipment, having specified characteristics, from a plurality of vendors, and wherein the user can easily determine which vendor offers the best price.’ 2:66-3:2.</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
<p><b>selling items corresponding to items in said vendor catalog; and</b></p>		<p>Vendor identification code: ‘When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.’ 2:25-29.” (DX-244)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell Z43 at p. 9):</b></p> <p>“Dworkin discloses using a first set of criteria for catalog selection (Fig. 3). The criteria can be set up so that a predetermined [sic] vendor’s catalog is always searched by including that vendor’s catalog in each of the categories of Fig. 3.” (DX-244)</p>
<p><b>a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S45 at p. 9):</b></p> <p>“J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.” (DX-96)</p> <p>““Once you’ve entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer.’ L0123623.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R45 at p. 9):</b></p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z45 at p. 9):</b></p> <p>“The search program was discussed in connection with ‘172 claim 1b.” (DX-244)</p>
<p><b>9. An electronic sourcing system comprising:</b></p>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON Manual describes an electronic-sourcing system, the J-CON (“Jobber- Connection”) system, that was designed for use in the operation and</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z49 at p. 11):</b></p> <p>“Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S49 at p. 11):</b></p> <p>“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: ‘PartFinder is J-CON’s electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.’” (DX-96)</p> <p>“Purchasing items is disclosed [sic], e.g., at L0123459 et seq. (‘Start the Sale’). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R49 at p. 11):</b></p> <p>“J-CON is an electronic sourcing system. (L0123423).” (DX-96)</p>	<p>from sources, suppliers or vendors: ‘An automated system assists a user in locating and purchasing goods or services sold by a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, specifications and/or availability.’ Abstract.” (DX-244)</p>
<p><b>a collection of catalogs of items stored in an electronic format;</b></p>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z51 at p. 12):</b></p> <p>“Dworkin discloses this element, as shown in Fig. 1:</p> <p>In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual</p>

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		suppliers. 3:66-68. See also '172 claim 1c." (DX-244)
<b>a first identification code associated with a first item in a first catalog;</b>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S53 at p. 12):</b></p> <p>"Items in J-CON can be identified by codes, such as manufacturer's code (L0123450) or part number (L0123456)." (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z53 at p. 12):</b></p> <p>"When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.' 2:25-29." (DX-244)</p>
<b>a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.</b>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S56 at p. 13):</b></p> <p>"InterChange is J-CONs electronic cross-reference for parts. You begin InterChange by pressing InterChange from any field on the POS screen except WRKSTAT or from PartFinder.' L0123450." (DX-96)</p> <p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts). InterChange can find an InterChange part even if you do not know the manufacturer or the complete part number of the competitive part.' L0123601." (DX-96)</p> <p>"InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder.' L0123621." (DX-96)</p> <p>"InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.' L0123628." (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S57 at p. 13):</b></p> <p>"J-CON had a sophisticated system for keeping track of equivalent items, dividing them into 'Replaced Parts,' 'Substitute Parts,' and 'Can-Use Parts.'</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z56 at p. 13):</b></p> <p>"When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.' 2:25-29. This teaches that the same product, which will have different catalog numbers when listed by different suppliers, will all be retrieved as part of a search. The user can then request detail information about each product retrieved: 'For each product, the entries in FIG. 6 include a number which identifies the product, the name of the manufacturer, the manufacturer's model number for the product, the lowest price available among all the vendors in the database, the average price for the product for all the vendors in the database, and the list price for the product.' 6:26-32. In this manner the 'other identification code' is obtained." (DX-244)</p>

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	L0123551. Furthermore, 'Alternate Parts' and 'Primary and Alternate Manufacturers' are disclosed at L0123613." (DX-96)	
<b>21. An electronic sourcing system comprising:</b>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>"The J-CON Manual describes an electronic-sourcing system, the J-CON ("Jobber- Connection") system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called "Jobbers" in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the '172 Patent Reexamination at 22)." L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S60 at p. 14):</b></p> <p>"J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: 'PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.'" (DX-96)</p> <p>"Purchasing items is disclosed [sic], e.g., at L0123459 et seq. ('Start the Sale'). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information)." (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R60 at p. 14):</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z60 at p. 14):</b></p> <p>"Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: 'An automated system assists a user in locating and purchasing goods or services sold by a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, specifications and/or availability.' Abstract." (DX-244)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>“J-CON is an electronic sourcing system. (L0123423).” (DX-96)</p>	
<p><b>a requisition module including data fields, user generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S62 at p. 14):</b></p> <p>“In PartSource, items can be partially described via wildcards in data fields: ‘With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters.’ L0123472.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R62 at p. 14):</b></p> <p>“J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z62 at p. 14):</b></p> <p>“To the extent that "user-generated" means" user-selected," this limitation is disclosed in Dworkin, as shown in Fig. 5. [DX-244]</p> <p>See also '172 1e.”</p>
<p><b>a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format, a catalog selection criteria used to select less than said entire collection, said searching module being used to generate additional search-module criteria for said data fields of said requisition module;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S66 at p. 15):</b></p> <p>“To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>Searches may be limited to a particular manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S69 at p. 16):</b></p> <p>“To the extent meaning can be ascribed to</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z63 at p. 15):</b></p> <p>“Dworkin discloses this element, as shown in Fig. 1:</p> <p>‘In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers. 3:66-68. See also '172 claim 1c.’” (DX-244)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell Z66 at p. 15):</b></p> <p>“To the extent ePlus contends that Lawson's accused system meets this limitation, it is also met by Dworkin and Lawson's prior art system.</p> <p>‘It is another object to provide a system which replaces a plurality of catalogs, and which greatly reduces the time required in shopping for products or services. It is another object to provide a system and method as described above, wherein a user can easily shop</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>this limitation, the search described at L0123609 discloses generation of additional search criteria: 'The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name.'” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R66 at p. 15):</b></p> <p>“The J-CON system enabled a user to enter part numbers as a basis for searching the database for desired items and the results would display additional information. (L0123625).” (DX-96)</p>	<p>for equipment, having specified characteristics, from a plurality of vendors, and wherein the user can easily determine which vendor offers the best price.’ 2:66-3:2.</p> <p>Vendor identification code: ‘When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.’ 2:25-29.” (DX-244)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell Z69 at p. 16):</b></p> <p>“To the extent meaning can be ascribed to this limitation, the search screen of Fig. 3 generates additional search module criteria as shown in Fig. 4.” (DX-244)</p>
<p><b>a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search module criteria;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S70 at p. 16):</b></p> <p>“J-CON generated multiple purchase orders from a single requisition . ‘The purchasing programs enable you to quickly create purchase orders based on your real needs.’ L0123423.” (DX-96)</p> <p>““You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up P0 control files in Function 7.7.’ L0123693.” (DX-96)</p> <p>“Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: ‘When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those</p>	



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	<p>manufacturers to see which ones need to be ordered.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R70 at p. 16):</b></p> <p>“J-CON generated multiple purchase orders from a single requisition in a number of different ways. (L013617).” (DX-96)</p>	
<p><b>wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S71 at p. 17):</b></p> <p>“InterChange provides the capability to find multiple sources for generally equivalent items: ‘J-CON uses the manufacturer conversion tables during purchasing receiving automatic part maintenance and store-to-store inquiries. The tables can convert manufacturer codes subline numbers and price codes.’ L0124150.” (DX-96)</p> <p>““InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder.’ LOI 23621. ‘To find an InterChange for a part the first step is to enter the part number in the COMPETITIVE PART field. The competitive part is the part for which you want to find an equivalent part.’ L0123622.” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z71 at p. 17):</b></p> <p>““When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.’ 2:25-29.” (DX-244)</p>
<p><b>wherein said multiple sources is limited by said catalog searching module providing a match according to said usergenerated criteria, said search-module criteria and a determination system that located items are generally equivalent; and</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S74 at p. 17):</b></p> <p>“Determination: ‘InterChange has a self-reference feature which is helpful to the novice counterperson who might look for an InterChange part for a line you carry. If an InterChange part is not found for the competitive part entered, InterChange checks to see you carry the competitive part.’ L0123628.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R74 at p. 17):</b></p> <p>“The J-CON system used a cross-reference module to determine if items</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z74 at p. 17):</b></p> <p>““When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.’ 2:25-29.</p> <p>The search is limited as shown in Fig. 3.</p> <p>This discloses that Dworkin had the ability to retrieve generally equivalent items (whatever that term means) and</p>



Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).” (DX-96)	thus had the required ‘determination system.’” (DX-244)
<p><b>wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S77 at p. 18):</b></p> <p>“‘If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts).’ L0123601. ‘[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.’ L013628” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R76 at p. 18):</b></p> <p>“The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 &amp; L0123601).” (DX-96)</p>	
<p><b>22. An electronic sourcing system as recited in claim 21, wherein said determination system includes an identical identification code for each of said located items.</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S78 at p. 18):</b></p> <p>“This limitation has no ascertainable meaning. Nevertheless, parts that are equivalent in the J-CON system are identical unless they are identified as an alternate or replacement part: ‘When you enter replaced part and the quantity available is larger than the quantity ordered, J-CON displays the replacement part in the miscellaneous information section of the POS screen.’ L0123485.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R78 at p. 18):</b></p> <p>“The J-CON system located interchangeable part from different catalogs are associated with a</p>	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	‘competitive part number’ in the cross-referencing module InterChange. (L0123625). The JCON system renders claim 22 obvious when combined with the Fisher RIMS system or the TV/2 system.” (DX-96)	
<b>29. An electronic sourcing system comprising:</b>	<p data-bbox="516 541 967 594"><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p data-bbox="516 604 967 1140">“The J-CON Manual describes an electronic-sourcing system, the J-CON (“Jobber- Connection”) system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p data-bbox="516 1171 967 1224"><b>From Shamos Claim Chart (Ex. G) (Cell S79 at p. 19):</b></p> <p data-bbox="516 1266 967 1381">“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p data-bbox="516 1423 967 1602">(Retail) Locating items is disclosed, e.g., at L012360: ‘PartFinder is J-CON’s electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.’” (DX-96)</p> <p data-bbox="516 1644 967 1843">“Purchasing items is disclosed [sic], e.g., at L0123459 et seq. (‘Start the Sale’). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).” (DX-96)</p> <p data-bbox="516 1875 967 1898"><b>From Shamos Claim Chart (Ex. G)</b></p>	<p data-bbox="992 541 1419 594"><b>From Shamos Claim Chart (Ex. G) (Cell Z79 at p. 19):</b></p> <p data-bbox="992 625 1419 1140">“Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: ‘An automated system assists a user in locating and purchasing goods or services sold by a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, specifications and/or availability.’ Abstract.” (DX-244)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>(Cell R79 at p. 19):</p> <p>“J-CON is an electronic sourcing system. (L0123423).”</p>	
<p>a collection of catalogs of items stored in an electronic format;</p>		<p><b>From Shamos Claim Chart (Ex. G) (Cell Z81 at p. 20):</b></p> <p>“Dworkin discloses this element, as shown in Fig. 1:</p> <p>In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers. 3:66-68. See also ‘172 claim 1c.” (DX-244)</p>
<p>a first set of predetermined criteria associated with said collection of catalogs;</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S83 at p. 20):</b></p> <p>“If ‘first set of pre-determined criteria’ means restriction to specific catalogs, then searches may be limited by manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z83 at p. 20):</b></p> <p>“If ‘first set of pre-determined criteria’ means restriction to specific catalogs, then the pre-determined criterion is the general type of product or service to be located, as shown in Fig. 3.” (DX-244)</p>
<p>a second set of predetermined criteria associated with items from each of said catalogs;</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S85 at p. 21):</b></p> <p>“If ‘second set of pre-determined criteria’ means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. ‘The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be.’ L0123609.” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z85 at p. 21):</b></p> <p>“If ‘second set of pre-determined criteria’ means restriction to items, then items may be searched by selecting product subcategories as shown in Fig. 4.” (DX-244)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>“J-CON also provided for wildcard searching: ‘When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices.’ L0123473.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R85 at p. 21):</b></p> <p>“J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).” (DX-96)</p>	
<p><b>a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S86 at p. 21):</b></p> <p>“‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.</p> <p>The purpose of InterChange was to allow selection from among competitive items from multiple sources.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S87 at p. 22):</b></p> <p>“J-CON had a sophisticated system for keeping track of equivalent items, dividing them into ‘Replaced Parts,’ ‘Substitute Parts,’ and ‘Can-Use Parts.’ L0123551. Furthermore, ‘Alternate Parts’ and ‘Primary and Alternate Manufacturers’ are disclosed at L0123613.” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z86 at p. 21):</b></p> <p>“To the extent ePlus contends that Lawson's accused system meets this limitation, it is also met by Dworkin and Lawson's prior art system.</p> <p>‘It is another object to provide a system which replaces a plurality of catalogs, and which greatly reduces the time required in shopping for products or services. It is another object to provide a system and method as described above, wherein a user can easily shop for equipment, having specified characteristics, from a plurality of vendors, and wherein the user can easily determine which vendor offers the best price.’ 2:66-3:2.</p> <p>Vendor identification code: ‘When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained.’ 2:25-29.” (DX-244)</p>
<p><b>a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S89 at p. 22):</b></p> <p>“J-CON included a search program for selecting specific items. Line items (desired items) are partially described on</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z89 at p. 22):</b></p> <p>“The search program was discussed in connection with '172 claim 1b.” (DX-244)</p>

<b>Claim Element</b>	<b>Admitted Exhibits Relied on by Dr. Shamos for J-CON</b>	<b>Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin</b>
<b>catalog selection protocol; and</b>	<p>a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.” (DX-96)</p> <p>““Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer.” L0123623.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R89 at p. 22):</b></p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>	
<b>a cross-reference table linking a vendor item catalog number from said vendor catalog with an item catalog number from said predetermined third party.</b>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S92 at p. 23):</b></p> <p>““If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts).’ L0123601. ‘[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.’ L013628.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R91 at p. 22):</b></p> <p>“J-CON included a cross-reference module. (L0123450 &amp; L0123601).” (DX-96)</p>	
<b>Claim Element – 172 Patent</b>	<b>Admitted Exhibits Relied on by Dr. Shamos for J-CON</b>	
<b>1. An electronic sourcing system comprising:</b>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON Manual describes an electronic-sourcing system, the J-CON (“Jobber- Connection”) system, that was</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z15 at p. 2):</b></p> <p>“Dworkin discloses an electronic system for use by a prospective buyer</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>designed for use in the operation and management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S15 at p. 2):</b></p> <p>“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: ‘PartFinder is J-CON’s electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.’” (DX-96)</p> <p>“Purchasing items is disclosed [sic], e.g., at L0123459 et seq. (‘Start the Sale’). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R15 at p. 2):</b></p> <p>“J-CON is an electronic sourcing system. (L0123423).” (DX-96)</p>	<p>to locate and find items to purchase from sources, suppliers or vendors: “An automated system assists a user in locating and purchasing goods or services sold by a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, specifications and/or availability.” Abstract.” (DX-244)</p>
<p><b>a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell S17 at p. 3):</b></p> <p>“To the extent that ePlus contends that this limitation is met by Lawson’s accused system, i.e., that restricting a search by vendor number constitutes searching a ‘separate portion,’ this limitation is also</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z17 at p. 3):</b></p> <p>“Dworkin discloses this element, as shown in Fig. 1:” (DX-244)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell Z18 at p. 3):</b></p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>met by J-CON and Lawson's prior art system.</p> <p>J-CON maintained a database of items. 'J-CON's Point-of-Sale/total Recall uses the latest Relational Database (RDB) technology so that even the most inexperienced counterperson can quickly and accurately enter sales and print tickets.' L0123449. Different portions of the database could be searched separately." (DX-96)</p> <p>"J-CON's database contained products of multiple vendors. L0123693" (DX-96)</p> <p>"J-CON also maintained a PartFinder database. L0123658" (DX-96)</p> <p>"J-CON further made use of a PartSource database: 'PartSource is a licensed product from CCI that uses Relational Database (RDB) technology to give you price sheet prices and the correct selling price for parts that are not in your JIF.' L0123472." (DX-96)</p>	<p>"The database contains information about products and/or services, and the vendors who sell them. In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers.' 3:65-68. Portions of the database may be searched separately: 'As shown in FIG. 3, the user has the choice of searching for 1) hardware products, 2) software products, or 3) software consultants. These first three choices invoke the main function of the system, that is, to search the database for information on particular products or services.'" (DX-244)</p>
<p><b>means for entering product information that at least partially describes at least one desired item;</b></p>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>"The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the '172 Patent Reexamination at 22)." L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S21 at p. 4):</b></p> <p>"J-CON discloses a means for entering product information that at least partially describes at least one desired item. Line items (desired items) are partially described on a display screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471." (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z21 at p. 4):</b></p> <p>"Dworkin discloses a means for entering product information that at least partially describes at least one desired item: Fig. 4 shows entering a code describing a category of products, e.g. '19' for scanners. The code partially describes an item.</p> <p>The user interface is terminal 5 and associated display software." (DX-244)</p>



Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p>“In PartSource, items can be partially described via wildcards: ‘With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters.’ L0123472.” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R21 at p. 4):</b></p> <p>“J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).” (DX-96)</p>	
<p><b>means for searching for matching items that match the entered product information in the selected portions of the database;</b></p>	<p><b>From Shamos Report (Ex. F) at ¶196:</b></p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 &amp; 11 &amp; Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 &amp; 33; Non-Final rejection in the '172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R23 at p. 4):</b></p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z23 at p. 4):</b></p> <p>“Dworkin discloses a means for searching for search results that match the entered product information in the selected portions of the database: ‘The system accepts a selection from the user, in block 31. The selection can be made by transmitting the number associated with the desired item.’ 5:35-37. See also 5:55-62.</p> <p>“Thus, if the user indicates that the printer must have a letter-quality speed of 40 cps, the system will search for printers which have a letter-quality speed of 40 cps or faster.’ 6:7-10. Searching cannot be performed unless the criteria are communicated to the search engine.</p> <p>‘When the user has entered these specifications, the system searches its database, in block 39, for products fulfilling the indicated criteria.’ 6:12-14.</p> <p>‘Then, in block 40, the system displays the results.’ 6:14-15.” (DX-244)</p>



Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
<p><b>means for generating an order list that includes at least one matching item selected by said means for searching;</b></p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell R25 at p. 5):</b></p> <p>“J-CON created list of parts meeting a specific criteria in which a user could select parts and quantities to purchase. (L0123603 &amp; L0123610-11).” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z25 at p. 5):</b></p> <p>“Dworkin discloses a means for generating a list of desired catalog items that includes at least one search result selected by said means for searching.</p> <p>Selecting is disclosed in the reference: ‘At the bottom of each screen, as shown in FIG. 7, the user is given the choice of 1) ordering a product, 2) viewing the next screen of data, if any, or 3) exiting from this part of the program. The user enters a choice, and the system accepts this input, in block 57.’ 7:66-8:2.</p> <p>The list of desired catalog items comprises the item selected for ordering.</p> <p>The user interface was discussed above in connection with element ‘172 1b.’ (DX-244)</p>
<p><b>means for building a requisition that uses data obtained from said database relating to selected matching items on said order list;</b></p>	<p><b>From Shamos Report (Ex. F) at ¶197:</b></p> <p>“Upon selection of desired parts from database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON Manual at Ch. 3, Sec. 2, Pages 1, 4 &amp; 8-9; Final Rejection in the ‘683 Patent Reexamination at 11-12 &amp; 34; Non-Final rejection in the ‘172 Patent Reexamination at 23).” L0123603, L0123607, L0123611-12 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S29 at p. 5):</b></p> <p>“The requisition module has access to data in the database: ‘PartFinder is J-CONs electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts customer wants and put them on the ticket.’ L0123601” (DX-96)</p>	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for J-CON	Admitted Exhibits Relied on by Dr. Shamos for U.S. Patent No. 4,992,940 to Dworkin
	<p><b>From Shamos Claim Chart (Ex. G) (Cell R29 at p. 5):</b></p> <p>J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).” (DX-96)</p>	
<p><b>means for processing said requisition to generate purchase orders for said selected matching items.</b></p>	<p><b>From Shamos Report (Ex. F) at ¶200:</b></p> <p>“Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 &amp; Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the ’683 Patent Reexamination at 12; Non-Final rejection in the ’172 Patent Reexamination at 23-24).” L0123691; L0123693-699 (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell S31 at p. 6):</b></p> <p>““You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS.’ L0123693” (DX-96)</p> <p>“The module has access to the requisition (ticket): ‘When you compute PO for pdmai or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.’ L0123695” (DX-96)</p> <p><b>From Shamos Claim Chart (Ex. G) (Cell R31 at p. 6):</b></p> <p>“J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).” (DX-96)</p>	<p><b>From Shamos Claim Chart (Ex. G) (Cell Z31 at p. 6):</b></p> <p>“The order module of Dworkin generates purchase orders. A ‘predetermined rule,’ e.g. is that a user can set up the system so he need not enter a name and address each time a product is ordered. 8:20-24.” (DX-244)</p>